

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

In re AURORA CANNABIS INC.
SECURITIES LITIGATION

This Document Relates To:

ALL ACTIONS.

) No. 2:19-cv-20588-BRM-JBC

)

) CLASS ACTION

)

) DECLARATION OF QUANG MA

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I, Quang Ma, declare as follows:

1. I am one of the Court-appointed lead plaintiffs in the above-captioned action. I submit this declaration in support of the settlement of this action. I have personal knowledge of the matters referred to herein.

2. Between December 2019 through the present, I spent over 50 hours assisting counsel in developing and prosecuting this case. These tasks included:

(a) Initial communications with counsel regarding a potential case, phone calls and correspondence with counsel concerning my stock transactions and losses, communications concerning plaintiff duties, responsibilities and potential exposure, and independent research of these issues;

(b) Review of my personal files concerning my stock purchases and sales, which I reviewed for accuracy and completeness;

(c) Review and comment on draft lead plaintiff papers, and communications with counsel regarding the accuracy of papers, including my losses;

(d) Review of the draft amended complaint, the second amended complaint, the third amended complaint, and discussions with counsel regarding these documents;

(e) Review of Defendants' motions to dismiss and lead plaintiffs' responses, communications with counsel regarding the litigation process, and review of the Court's orders on the motions to dismiss;

- (f) Discussions with counsel regarding the obligations to respond to discovery demands and production of same;
- (g) Review of the motion for reconsideration and subsequent motion for leave to amend the pleadings and file the proposed fourth amended complaint;
- (h) Discussions with counsel regarding settlement issues and strategy; and/or
- (i) Communications with counsel regarding the settlement process and procedure, allocation of proceeds, notice and claim forms and the final hearing, as well as review of all the settlement papers.

3. Based on my familiarity with the case, review of significant documents filed in the case and my extensive communications with lead counsel, I believe I am in a good position to comment on the settlement and the request for attorneys' fees. I believe that the \$8,050,000 recovery in this case is good. I understand the difficulty of proving these cases at trial and understand that even in a strong case the class could recover nothing. I also understand that Defendants have argued that class-wide damages are zero. I also appreciate that a settlement now guarantees that the class members will be paid a percentage of their losses. On these grounds, and others, I fully support the settlement.

4. In addition, based on my regular communications with counsel and my review of the documents filed in this case, I believe that lead counsel should be

awarded their requested fee of 25% of the Settlement Fund along with their expenses. I understand that lead counsel has been paid nothing to date and has expended a significant amount of time and money on this matter. In my opinion, lead counsel did a very good job in this case and should be compensated accordingly.

5. My counsel have informed me that the Private Securities Litigation Reform Act allows for the reimbursement of time and expenses incurred by a representative plaintiff such as myself in connection with services rendered in the litigation. In total, I am seeking reimbursement of \$10,000 for my time and for out-of-pocket costs. I believe this amount is reasonable and well supported by the time and effort that I put into overseeing the litigation. I estimate that I have spent in excess of 50 hours over the course of more than four years to discharge my responsibilities in this action as described in paragraph 2, above. This generates an hourly rate of less than \$200 per hour, which is reasonable considering the income I generate annually from the wireless industry company that I manage. As such, I respectfully submit that the proposed \$10,000 reimbursement for my time spent is reasonable.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 18 day of December, 2024, at Pleasanton, California.

Signed by:



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QUANG MA